

## Division of Workforce Development

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Tom Jones  
Director

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### DWD Issuance 12-99

**Subject:** Coordination of all Workforce Investment Act (WIA) Title I-B programs with programs under Title IV of the Higher Education Act including the Pell Grant Program.

**I. Purpose:** To provide information to DWD staff and LWIBs concerning WIA Section 134(d)(4)(B), Section 663.320(b) of the Regulations, and the language in the preamble to the Interim Final Regulations regarding coordination of alternate sources of training funds, including Pell grant funds, with WIA training funds.

**III. Substance:** Section 134(d)(4)(B) of the WIA requires the coordination of training costs with funds available under other Federal programs, including programs authorized under Title IV of the Higher Education Act. To avoid duplicate payment of costs when an individual is eligible for both WIA training funds and other assistance, Section 663.320 (b) stipulates that where Higher Education Act (HEA) Title IV financial assistance, including Pell Grants, is available to WIA training eligible customers, program operators and training providers must coordinate use of funds by entering into informational exchange arrangements.

Coordination arrangements should include consideration of all available sources of funds, excluding loans, in determining an individual's overall needs for WIA funds. The exact mix of funds should be determined based on the availability funding for either training or supportive services costs, with the goal of ensuring that the costs of the training program the participant selects are fully paid and that necessary supportive services are available so that the training can be completed successfully. This determination should focus on the needs of the participant. Participation in a WIA funded training program shall not require participants to apply for student loans or incur debt as a condition for WIA participation.

With such coordination and arrangements, the WIA counselor is likely to know the amount of WIA funds available to the WIA participant when calculating the amount of financial assistance needed for the participant to complete the training program successfully. The WIA counselor needs to work with the WIA participant to calculate the total funding resources available as well as to assess the full “education and education related costs” (training and supportive services costs) incurred if the participant is to complete the chosen program. This also ensures that duplicate payments of training costs are not made.

Section 663.320 (c) implements the requirements of WIA section 134 (d) (4) (B) (ii). This section permits a WIA participant to enroll in a training program with WIA funds while an application for Pell Grant funds is pending, but requires that the local workforce investment area be reimbursed for the amount of the Pell Grant used for training if the application is approved. Since Pell Grants are intended to provide for both tuition and other education-related costs, the Rule also clarifies that only the portion provided for tuition is subject to reimbursement.

To successfully develop and complete an individual assessment and re-employment plan, the LWIB and/or its subcontractor(s) should assist the participant to establish eligibility for Pell Grant funds or other forms of financial assistance. The mix of training and supportive service funds from WIA and other funds, including Pell funds, should be documented and maintained in the customer file.

The procedures for determining the appropriate mix of funds to be used for supportive services and training is the responsibility of the LWIB and/or subcontractor(s). These procedures should clarify when and in what sequence to use WIA funds and/or other sources of funds, including Pell Grant funds for training and supportive services. Pell Grant funds may be used in any sequence to help pay tuition costs and/or supportive service costs as agreed with the customer.

As part of a continuing regular information sharing process, the LWIB coordination arrangement should include a process to obtain the amount and disposition of HEA Title IV awards and other types of financial aid to each WIA participant served.

### **III. Action:**

This issuance becomes effective July 1, 2000 for participants enrolled into WIA funded classroom training activities. Local areas may further interpret, but must not, contradict or delete from, the contents of this issuance and any such interpretations must be documented and retained on file by the LWIB.

LWIB and local DWD staff should distribute this information to appropriate staff.

**IV. Contact:** Please contact Lindell Thurman, Manager, Field Services at 573.526-8241 or Roger Baugher, Manager, Planning and Research, at 573.526-8262 with questions regarding this issuance.

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Tom Jones, Director

MB/LT/mr/bba

cc: Elaine Bryan  
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